

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
ALBANY DIVISION

**ARDRA HARRIS,**

**Plaintiff,**

**v.**

**AMERICANWORK, LLC formerly  
known as Americanwork, Inc.,**

**Defendant.**

Civil Action No. 1:20-cv-94 (WLS)

**Declaration of Charles R. Bridgers**

Pursuant to 28 U.S.C. §1746 and in accordance with the Court's Order dated January 5, 2021 [Dkt. 15] Charles R. Bridgers hereby submits his declaration in further support of the Parties Joint Motion for Approval Settlement.

1. My name is Charles R Bridgers. I am over the age of twenty-one (21) and suffer from no legal disabilities. I make the following Declaration based on my personal knowledge as well as the contemporaneous business records of my firm.
2. I have been practicing law since my graduation, *cum laude*, from Georgia State College of Law in 1993. I am admitted in all state courts in Georgia, the United States District Court for the Northern and Middle Districts of Georgia, as well as the United States Court of Appeals for the Third, Sixth, and Eleventh Circuits. I have practiced employment law since approximately 1996 primarily in the Atlanta metropolitan area but also throughout the state

of Georgia. I have been a presenter at several CLE sessions including, most recently, in December of 2019 where I spoke on a wage and hour update panel at the Labor & Employment Law Institute (State Bar) and in September of 2016 where I presented a paper on Certification and Decertification of § 216(b) Collective Actions under the Fair Labor Standards Act. My practice began to focus on the Fair Labor Standards Act in 2009. I have served as counsel in approximately 340 FLSA cases since that time. I hold an AV rating in the Martindale-Hubble Law Directory and have recently been selected in the Super Lawyers program.

3. During my career, I have on several occasions represented employees in collective actions under the FLSA. In 2014, I represented 36 warehouse workers who alleged they were misclassified as independent contractors in *Jamaal Foster, et al. v. A-1 Quality Labor Services, LLC*, 1:11-CV-3342-JEC. That case resulted in a settlement of \$400,000. In 2013 and 2014 I represented 13 Fire Lieutenants and 2 Battalion Chiefs against the City of East Point who alleged that they were misclassified as exempt. That settlement resulted in significant back pay and an agreement to reclassify the Lieutenants and Battalion Chiefs as non-exempt. *Brandon Ervin, et al. v. City of East Point, Georgia*, 1:12-CV-04270-CAP.
4. During my twenty-five plus years as an attorney, I have conducted approximately eighteen jury trials as well as a number of bench trials. In August 2013, for instance, a jury awarded our five clients contractually owed severance pay and attorneys' fees and costs of approximately \$500,000

in *Dr. Johnny Wilson, et al. v. Clark Atlanta University, Inc.*, Superior Court of Fulton County, Georgia, Civil File Action No. 2011-CV-196090. Other recent jury trials involving employment matters where I served as counsel include *Baker v. Baldwin Paving Company, Inc.*; 1:14-cv-03367-LMM (FLSA); *Nelson v. Jackson*; 1:14-cv-02851-ELR (ADA); *Sayyed v. Braids, Weaves & Things, Inc.*; 1:16-cv-01392-CAP (Title VII); and *Jackson v. P & K Restaurant Enterprise, LLC, et al*; 1:15-cv-00753-MHC (FLSA).

5. Since April of 2020, along with the law firm of DeLong, Caldwell, Bridgers, Fitzpatrick & Benjamin, LLC, I have represented the Plaintiff in this action. I shared primary responsibility for prosecuting this matter with my law partner Mitchell D. Benjamin and our Senior Associate Matthew W. Herrington.
6. Our firm has a practice of keeping contemporaneous time and expense records as part of our regular business activity. Individual slips (or records of activities and costs) are created by persons with knowledge of the activities described. The information is tracked in Timeslips, our time and billing software. I assign certain tasks to other attorneys and to our staff members. As such, I am generally aware of these timekeepers' activities. As part of my typical routine, I review time and billing records on a regular basis. A true and correct copy of the firms billing records for fees is attached hereto as Attachment A. A true and correct copy of the firm's billing records for costs is attached hereto as Attachment B. These records are an accurate

representation of the time, effort, and costs incurred in prosecuting this matter.

7. In total, the firm has incurred \$13,553.27 in billable attorney fees (per Attachment A) and \$485.00 in expenses (per Attachment B) in prosecuting this action, for a total of \$14,038.27.
8. The following persons recorded billed time in this matter (per Attachment C):

<b>Time Keeper</b>	<b>Position</b>	<b>Billable Rate</b>	<b>Total Billed</b>
Charles R. Bridgers	Partner	\$425	\$3,570.71
Mitchell D. Benjamin	Partner	\$425	\$3,690.39
Matthew W. Herrington	Senior Associate	\$350	\$1,400.00
Jessica Sorrenti	Senior Paralegal	\$165	\$4,336.75
Sarah Toenes	Paralegal	\$125	\$275

9. Based on my extensive experience in litigating civil rights and labor and employment claims including the FLSA, I am familiar with the hourly rates charged by other civil rights and labor and employment attorneys (and their staffs), including attorneys who represent primarily plaintiffs and attorneys who represent primarily employers.
10. Consistent with the “lodestar” framework for analyzing attorney’s fees claims mandated in *Hensley v. Eckerhart*, 461 U.S. 424, 103 S.Ct 1933, 76 L.Ed.2d 40 (1983), as interpreted in *Norman v. Housing Authority of the City of Montgomery*, 836 F.2d 1292 (11th Cir. 1988) and *Perkins v. Mobile Housing Bd.*, 847 F.2d 735 (11th Cir. 1988), the following information is

intended to establish the reasonableness of the number of hours expended in this case, as well as the reasonableness of my hourly rate in light of the prevailing market conditions in the Atlanta, Georgia geographical area.

11. My hourly rate of \$425 per hour is reasonable and in line with the rates charged by other attorneys in the Atlanta area who possess similar skill, experience and training. I now charge most of my new clients \$425 per hour whether paid hourly or on a contingency fee basis and have done so since January of 2018. This rate was specifically approved in *Villa-Garcia v. Latin Mundo #2, Inc. et al.*, Civil Action No. 1:17-cv-1834-TWT, Dkt. 23 (N.D. Ga. Feb. 21, 2018) (approving \$425 for all partners, \$325 for associate Matthew Herrington, \$165 for senior paralegal Jessica Sorrenti, and \$125 for paralegal Sarah Toenes) and has been implicitly approved in numerous FLSA settlements as part of a settlement approval since that time. Accord, e.g., *Smith, et.al. v. Childfirst 24 Hour Childcare, et.al.*, 1:18-cv-03786-WMR, NDGa, Dkt. 56: "the attorney's fees . . . are reasonable and customary;" *Haddock v. Jasper County, Georgia*, 5:18-cv-00292-MTT (MDGa, Dkt. 14)("[T]he attorneys' fees including the rates charged by counsel . . . are reasonable.")(See Id, Dkt. 13-1 for declaration providing information on identical rates for partners and paralegals in our firm); *Willis v. Nishi Dreams, et.al.* 1:19-CV-00986-AT (NDGa, Dkt. 17)(identical rates for attorneys and staff are "reasonable and customary"). *Cooper, et.al., v. Parker Promotions, Inc*, Middle District of Georgia, 4:17-cv-00116-CDL, Dkt. 65 ("the attorneys' fees . . .") *Gertman v. City of Atlanta*, Civil Action

No. 1:17-cv-04960-MLB, Dkt. 82 (N.D. Ga. Sept. 25, 2020) (approving partner rates of \$425 for Bridgers, Fitzpatrick, and Benjamin as well as \$165 for Sorrenti and \$125 for Toenes stating, “The Court finds the hourly rates requested are reasonable . . .”); *Kelly v. BNFocus 3D Trucking, LLC et al.*, 1:20-cv-02781-WMR, Dkt. 19 (N.D. Ga. Oct. 15, 2020) (identical rates for Bridgers, Herrington, Toenes rates are “reasonable”).

12. Mr. Benjamin, a partner in the firm, represented the Plaintiff. He graduated from the State University of New York at Stony Brook in 1989, where he was a member of *Pi Sigma Alpha*, the National Political Science Honor Society. Thereafter, he attended Yeshiva University’s Benjamin N. Cardozo School of Law in New York City, graduating *Cum Laude* in 1993. He has been a member in good standing of the New York State bar since February, 1994 and the Georgia State bar since December, 1996. He has held an AV rating from Martindale-Hubbell since 2006 and has recently been ranked in Superlawyers. He has practiced labor and civil rights litigation since 1993 first in New York and then, from June of 1997 until December of 2000, as an associate attorney at Kirwan, Parks, Chasin & Miller, P.C. and successor firms. From December, 2000 through December, 2008, he was managing partner of the law firm of Johnson & Benjamin LLP and then Billips & Benjamin, LLP in which the focus of his practice was also labor and employment litigation. In June, 2015, he joined the firm of DeLong, Caldwell, Bridgers, Fitzpatrick & Benjamin LLC as a partner. During his career, he has participated in hundreds of federal employment/labor charges

and cases and have been lead counsel in a large number of cases including participation in multiple civil trial jury verdicts and collective actions under the FLSA. Mr. Benjamin's rate of \$425 is also reasonable. See listing of fee approvals above.

13. Matthew Herrington, our senior associate, assisted in this matter. Mr. Herrington has been practicing law since his graduation, *cum laude*, from the University of Georgia School of Law in 2013. He is admitted in all state courts in Georgia, the United States District Court for the Northern, Middle, and Southern Districts of Georgia, as well as the United States Court of Appeals for the Eleventh Circuit. He has practiced employment law—primarily Fair Labor Standards Act litigation—since approximately October 2013, primarily in the Atlanta metropolitan area but also throughout the state of Georgia. He has been an invited presenter at a CLE session organized by the Georgia chapter of the National Employment Lawyers Association. Mr. Herrington has served as counsel in over 100 FLSA cases, including several collective actions. He has acted as lead counsel on two jury trials and one bench trial. In May 2018, for instance, a jury awarded my five clients overtime wages, liquidated damages and attorneys' fees and costs of approximately \$814,000 in *Casey et al. v. 1400 Northside Drive, Inc.*, Civil Action No. 1:16-cv-4517-SCJ (N.D. Ga.). Other representative employment matters where he served as lead counsel include *Dean v. 1715 Northside Drive, Inc. et al.*, 1:14-cv-3775-CAP (N.D. Ga.); *Martin v. Jobo's, Inc. et al.*, 1:13-cv-4242-RWS (N.D. Ga.); and *Fowler et al. v. OSP Prevention*

*Group et al.*, 1:17-cv-3911 (N.D. Ga.). Additionally, Mr. Herrington has twice presented oral argument before the Eleventh Circuit Court of Appeals on two occasions in FLSA matters. Mr. Herrington's rate of \$350 is reasonable in the Atlanta market. See listing of fee approvals above.

14. In representing the Plaintiff, we utilized the services of Ms. Jessica Sorrenti, senior paralegal. I am familiar with her backgrounds and skills. Ms. Sorrenti has worked as a paralegal for approximately twenty (20) years and with our firm for over nine years. She is fluent in Spanish and English. As the primary responsible attorney in our firm for this case, I have directed and supervised her efforts in this matter. Ms. Sorrenti's rate of \$165 is reasonable for a person of her experience in Atlanta, Georgia. See fee approval listing above. Also See *Villa-Garcia v. Latin Mundo #2, Inc. et al.*, Civil Action No. 1:17-cv-1834-TWT, Dkt. 23 (N.D. Ga. Feb. 21, 2018)(approving her rate at \$125 per hour); *Willis v. Nishi Dreams*, et.al. 1:19-CV-00986-AT, Dkt. 17 (N.D. Ga.) (identical rates for attorneys and staff are "reasonable and customary") (as part of FLSA approval motion)
15. Ms. Sarah Toenes, paralegal, also assisted in our representation. I am familiar with her backgrounds and skills. Ms. Toenes has worked as a paralegal for approximately ten years. As the primary responsible attorney in our firm for this case, I have directed and supervised her efforts in this matter. Ms. Toenes' rate of \$125 is reasonable for a person of her experience in Atlanta, Georgia. See *Villa-Garcia v. Latin Mundo #2, Inc. et al.*, Civil Action No. 1:17-cv-1834-TWT, Dkt. 23 (N.D. Ga. Feb. 21, 2018)

(approving her rate at \$125 per hour); *Willis v. Nishi Dreams*, et.al. 1:19-CV-00986-AT, Dkt. 17 (N.D. Ga.) (identical rates for attorneys and staff are “reasonable and customary”) (as part of FLSA approval motion).

16. I organized time billed (not expenses) into broad categories that reflect the phase of the litigation for both management, client budget, and fee application purposes. I have prepared a summary of those categories using the records of our firm. See Attachment D. (The substance of Attachment D’s billing records is the same as Attachment A except Attachment D is organized by category). The categorization is accurate for providing an overview of the effort incurred during each phase of the litigation given the limitation that it is sometimes difficult to categorize an individual entry with 100 percent certainty.
17. In further explanation of Attachment D, the following chart provides a description of the phases of litigation and how they are categorized along with a total amount of fees incurred per category (not expenses) incurred.

<b>Phase of Litigation</b>	<b>Description</b>	<b>Amount and Percentage Billed Per Phase</b>
01-Intake	Initial meetings with clients; initial development of factual narrative, advice about the process of litigation, decision to proceed, extensive pre-litigation settlement negotiations, and explanation of DCBFB Client	\$1,285.58 9.69%

	instructions and Retainer Agreement	
02-Complaint_COIP_Service	Initial factual investigation; draft and revisions of Complaint; client review of Complaint; Certificate of Interested Persons	\$3,782.79 28.50%
03-Answer_Disclosures_JPR	Review of Answer(s) filed; drafting, reviewing and finalizing Disclosures and Joint Preliminary Report	\$3,166.99 23.86%
06-DamageEst	Damage Estimate: Efforts reviewing time and pay records to prepare an estimate of Plaintiff's damages	\$604.25 4.55%
09-Protective-Order	Efforts re protective order motion and terms	\$42.50 0.32%
13-Motions	Drafting and Responding to Motions including motion to extend time to answer and motion to approve settlement.	\$1,084.00 8.17%
16-Settlement	Efforts to resolve matter including negotiation and attempts to resolve attorney fee issues	\$1,437.25 10.83%
26-Client Comm	General communication with client during scope of representation not otherwise categorized	\$35.00 0.26%
27-Legal Research Other	Conduct legal research not otherwise categorized	\$131.75 0.99%
29-Misc	Miscellaneous Duties Related to Case, review of incoming correspondence, incoming	\$134.50 1.01%

	orders, extensions, staff assignments	
30-Factual Development	Interviewing witnesses and reviewing facts not otherwise categorized	\$1,568.24 11.82%

18. Based on my experience and training, I possess the requisite skills and knowledge to adequately represent my client and to offer my professional opinion concerning the reasonableness of the number of hours expended in this case and the reasonableness of the hourly rates sought to be recovered.
19. In preparation for this Motion and in exercise of our “billing judgment”, I reviewed the fees and costs. I marked a few entries as “no charge” because they had to do with a financial transaction only tangentially related to this matter. I also deleted a few entries entirely that I could not confirm were related to this matter.
20. The expenses and the effort incurred were reasonable to prosecute this matter and to obtain an excellent result for the Plaintiff. Although several persons worked on this matter, as demonstrated in attachments to this declaration, none of the hours expended by counsel or staff has been “excessive,” “redundant” or “unnecessary.” To the contrary, at every opportunity, Plaintiff’s attorneys attempted to economize and to minimize expenses. As the Court will note, our staff members bill at different rates depending on their experience level. We attempt to assign tasks to the appropriate person to reduce the overall bill.

21. In light of the factors specified in *Johnson v. Georgia Highway Express*, 488 F.2d 714 (5th Cir 1974), the total fees and costs as set out above is eminently reasonable.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 25th day of January 2021.

s/ Charles R. Bridgers  
Charles R. Bridgers  
Georgia Bar No. 080791

# ATTACHMENT A

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Slip Listing

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## Selection Criteria

Clie.Selection	Include: Harris, Ardra
Slip.Transaction Type	Time
Slip.Classification	Open

Rate Info - identifies rate source and level

Slip ID	Dates and Time	Timekeeper Activity	Units DNB Time	Rate Rate Info	Slip Value
	Posting Status	Client Reference		Bill Status	
142769	TIME 4/24/2020 WIP <i>Ardra Harris: Intake interview with client; discuss with Benjamin.</i>	C.R. Bridgers Intake Harris, Ardra	0.85 0.00	425.00 T@1	361.25
142814	TIME 4/24/2020 WIP <i>Ardra Harris: Calls with potential client and discuss with Benjamin.</i>	C.R. Bridgers Intake Harris, Ardra	1.10 0.00	425.00 T@1	467.50
142878	TIME 4/24/2020 WIP <i>Telephone conference with Ardra Harris for initial intake</i>	M. Benjamin Intake Harris, Ardra	0.67 0.00	425.00 T@1	283.33
142828	TIME 4/29/2020 WIP <i>Edit retainer; send retainer, client info sheet, client intake sheet to client via <a href="#">DocuSign</a>; email with MDB</i>	S. Toenes Intake Harris, Ardra	0.30 0.00	125.00 T@1	37.50
142877	TIME 5/4/2020 WIP <i>Type up intake notes for Sorrenti to draft complaint.</i>	M. Benjamin Compl_COIP_Ser Harris, Ardra	0.25 0.00	425.00 T@1	106.25
142973	TIME 5/7/2020 WIP <i>File review; emails to and from CRB/MDB; <a href="#">internet</a> and legal research on Defendant; processing; began drafting Complaint; call to client-left message</i>	J. Sorrenti Compl_COIP_Ser Harris, Ardra	3.50 0.00	165.00 T@1	577.50

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Slip ID	Dates and Time	Posting Status	Description	Timekeeper	Units	Rate	Slip Value
				Activity			
				Client		Rate Info	
				Reference		Bill Status	
143030	TIME 5/11/2020 WIP		Call to client and obtained additional info. for Complaint; began revising drafted Complaint; prepared memo re: additional info. from client; email to client; email to CRB/MDB	J. Sorrenti Compl_COIP_Ser Harris, Ardra	0.90 0.00	165.00 T@1	148.50
143040	TIME 5/12/2020 WIP		Emails to and from client re: job descriptions; email to CRB/MDB; processing and review	J. Sorrenti Compl_COIP_Ser Harris, Ardra	0.30 0.00	165.00 T@1	49.50
143045	TIME 5/12/2020 12:02 PM WIP		Review documents provided by client, including job descriptions for various positions.	M. Benjamin Factual Development Harris, Ardra	0.20 0.00	425.00 T@1	85.00
143055	TIME 5/12/2020 WIP		Call to client and concluded conversation re: additional info. needed for Complaint; finished preparing memo re: additional info. from client; discussion with CRB re: jurisdiction; email to CRB/MDB; began finalizing drafted Complaint to include additional info. obtained from client	J. Sorrenti Compl_COIP_Ser Harris, Ardra	1.50 0.00	165.00 T@1	247.50
143072	TIME 5/12/2020 WIP		Review questions of venue with Sorrenti, Benjamin.	C.R. Bridgers Compl_COIP_Ser Harris, Ardra	0.41 0.00	425.00 T@1	174.25
143056	TIME 5/13/2020 WIP		File review and review of client docs; finished finalizing draft of Complaint; emails to and from CRB/MDB; revised and finalized Complaint; email to client re: reviewing Complaint and docs needed	J. Sorrenti Compl_COIP_Ser Harris, Ardra	2.00 0.00	165.00 T@1	330.00
143061	TIME 5/13/2020 12:12 PM WIP		Review and revise draft of complaint and accompanying documents.	M. Benjamin Compl_COIP_Ser Harris, Ardra	1.50 0.00	425.00 T@1	637.50

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Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time	Rate Rate Info Bill Status	Slip Value
143107 5/15/2020 WIP Call to client and discussed Complaint and documents needed; email to client; emails to and from <b>MDB</b>	J. Sorrenti Compl_COIP_Ser Harris, Ardra	0.50 0.00	165.00 T@1	82.50
143117 5/18/2020 WIP Review pay stubs, synopsis and work emails from client.	M. Benjamin Factual Development Harris, Ardra	0.37 0.00	425.00 T@1	155.83
143130 5/18/2020 WIP Emails to and from client; processing and review of documents from client; emails to and from <b>MDB</b> ; call to client and obtained additional information and clarification for drafted Complaint	J. Sorrenti Compl_COIP_Ser Harris, Ardra	2.00 0.00	165.00 T@1	330.00
143148 5/19/2020 WIP Review and revise draft of complaint.	M. Benjamin Compl_COIP_Ser Harris, Ardra	0.87 0.00	425.00 T@1	368.33
143199 5/19/2020 WIP Discussion with <b>MDB</b> re: additional info. from client; edited and revised drafted Complaint to include additional info. from client; emails to and from <b>MDB</b> ; email to client with revised final draft of Complaint; call to client	J. Sorrenti Compl_COIP_Ser Harris, Ardra	1.90 0.00	165.00 T@1	313.50
143181 5/20/2020 WIP Review venue issues with Benjamin and <b>Herrington</b> .	C.R. Bridgers Research-Legal Harris, Ardra	0.31 0.00	425.00 T@1	131.75
143202 5/20/2020 WIP Emails to and from client; discussion with <b>CRB</b> re: additional research on jurisdiction; prepared Civil Cover Sheet and Summons	J. Sorrenti Compl_COIP_Ser Harris, Ardra	0.60 0.00	165.00 T@1	99.00

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Slip ID	Dates and Time	Posting Status	Description	Timekeeper	Units	Rate	Slip Value
				Activity			
				Client		Rate Info	
				Reference		Bill Status	
143203	TIME 5/21/2020 WIP		Filed Complaint, Civil Cover and Summons with Court; email to CRB/MDB/FH re: filing fee; email to CRB/MDB/MH/SMT re: service; emails to and from MDB/CRB re: court's changes in Division and Judges	J. Sorrenti Compl_COIP_Ser Harris, Ardra	0.60 0.00	165.00 T@1	99.00
143204	TIME 5/21/2020 WIP		Review filing and responses of Court of errors and transfer to Albany District; Emails to Sorrenti and Benjamin re same.	C.R. Bridgers Compl_COIP_Ser Harris, Ardra	0.31 0.00	425.00 T@1	132.46
143411	TIME 6/5/2020 WIP		Review incormign representation letter, notes to file.	C.R. Bridgers Ans_Discl_JPS Harris, Ardra	0.10 0.00	425.00 T@1	42.50
143514	TIME 6/14/2020 WIP		review status of critical date background. Notes to Toenes.	C.R. Bridgers Intake Harris, Ardra	0.32 0.00	425.00 T@1	136.00
143521	TIME 6/15/2020 WIP		Discussion with MH re: facts of case and call he received from opposing counsel re: demand; emails to and from MDB/MH/CRB	J. Sorrenti Compl_COIP_Ser Harris, Ardra	0.30 0.00	165.00 T@1	49.50
143522	TIME 6/15/2020 WIP		Telephone conference with Herrington re: damages and settlement.	M. Benjamin Settlement Harris, Ardra	0.10 0.00	425.00 T@1	42.50
143528	TIME 6/15/2020 WIP		call and email with OC; discuss damages calculation issues with JLS and MDB; review stipulation to extend time to answer; review complaint	M. Herrington DamageEst Harris, Ardra	0.30 0.00	350.00 T@1	105.00

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Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time	Rate Rate Info Bill Status	Slip Value
143553 6/16/2020 WIP Draft COIP; electronically file COIP	S. Toenes Compl_COIP_Ser Harris, Ardra	0.30 0.00	125.00 T@1	37.50
143757 6/26/2020 WIP Review Defendant's Answer.	M. Benjamin Ans_Discl_JPS Harris, Ardra	0.20 0.00	425.00 T@1	85.00
143759 6/26/2020 WIP Emails to and from MDB re: status and Answer; review of Answer; email to client re: Answer and witness info, needed	J. Sorrenti Factual Development Harris, Ardra	0.60 0.00	165.00 T@1	99.00
143800 6/29/2020 WIP Emails to and from client re: witnesses; email to MH/MDB/CRB re: witness info. from client	J. Sorrenti Factual Development Harris, Ardra	0.20 0.00	165.00 T@1	33.00
143849 7/1/2020 WIP File review; drafted Proposed Scheduling Order; emails to and from MDB	J. Sorrenti Ans_Discl_JPS Harris, Ardra	1.30 0.00	165.00 T@1	214.50
144058 7/1/2020 WIP Draft Interlined Table of Complaint and Answer	S. Toenes Ans_Discl_JPS Harris, Ardra	1.50 0.00	125.00 T@1	187.50
144061 7/15/2020 WIP Review and revise draft of Rule 6/26 Scheduling order; email to Sorrenti re: same.	M. Benjamin Ans_Discl_JPS Harris, Ardra	0.25 0.00	425.00 T@1	106.25
144062 7/15/2020 WIP File review; drafted scheduling Order; email to MDB/CRB	J. Sorrenti Ans_Discl_JPS Harris, Ardra	1.00 0.00	165.00 T@1	165.00

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Slip ID	Dates and Time	Posting Status	Description	Timekeeper	Units DNB Time	Rate Rate Info Bill Status	Slip Value
				Activity Client Reference			
144098	TIME 7/16/2020 WIP		Emails to and from <b>MDB</b> ; email to <b>SMT</b> re; calendaring	J. Sorrenti Ans_Discl_JPS Harris, Ardra	0.20 0.00	165.00 T@1	33.00
144280	TIME 7/16/2020 WIP		Email opposing counsel to schedule <b>26F</b> conference	S. Toenes Ans_Discl_JPS Harris, Ardra	0.10 0.00	125.00 T@1	12.50
144245	TIME 7/21/2020 WIP		Discussion with <b>MDB</b> re: status; discussion with <b>MH</b> re: witnesses; email to <b>MH</b>	J. Sorrenti Factual Development Harris, Ardra	0.30 0.00	165.00 T@1	49.50
144185	TIME 7/23/2020 WIP		Prepare for Rule 26(f) conference by reviewing pleadings, attorney notes and draft of planning report; make rough calculation of damages.	M. Benjamin Ans_Discl_JPS Harris, Ardra	1.00 0.00	425.00 T@1	425.00
144186	TIME 7/23/2020 WIP		Emails to and from <b>MDB/MH</b> re: case info./docs; file review	J. Sorrenti Ans_Discl_JPS Harris, Ardra	0.30 0.00	165.00 T@1	49.50
144190	TIME 7/23/2020 WIP		Telephone conference with opposing counsel for Rule 26(f) conference.	M. Benjamin Ans_Discl_JPS Harris, Ardra	0.37 0.00	425.00 T@1	155.83
144192	TIME 7/23/2020 WIP		Revise draft of Planning Report as per telephone conference with opposing counsel for Rule 26(f) conference; draft email to opposing counsel with draft of scheduling order.	M. Benjamin Ans_Discl_JPS Harris, Ardra	0.52 0.00	425.00 T@1	219.58

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Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time	Rate Rate Info Bill Status	Slip Value
144383 8/5/2020 WIP File review; email to <b>MDB/CRB/MH</b> re: status	J. Sorrenti Misc Harris, Ardra	0.30 0.00	165.00 T@1	49.50
144399 8/6/2020 WIP Review and revise Plaintiff's Initial Disclosures including damages calculation; draft email to <b>Sorrenti</b> and <b>Herrington</b> with assigned tasks.	M. Benjamin Ans_Discl_JPS Harris, Ardra	0.92 0.00	425.00 T@1	389.58
144400 8/6/2020 WIP File review; drafted Initial Disclosures; call to client and obtained additional <b>info. to</b> complete drafted Disclosures; revised Disclosures to include additional <b>info. from</b> client; emails to and from <b>MDB</b>	J. Sorrenti Ans_Discl_JPS Harris, Ardra	2.40 0.00	165.00 T@1	396.00
144585 8/7/2020 WIP Review proposed changes to the draft of the Planning Report from opposing counsel.	M. Benjamin Ans_Discl_JPS Harris, Ardra	0.20 0.00	425.00 T@1	85.00
144426 8/10/2020 WIP Emails to and from <b>MDB/CRB/MH</b> ; review of time and pay records from Defendants;	J. Sorrenti Factual Development Harris, Ardra	0.70 0.00	165.00 T@1	115.50
144582 8/19/2020 WIP Emails to and from opposing counsel re: status and filing <b>JPR</b>	J. Sorrenti Ans_Discl_JPS Harris, Ardra	0.08 0.00	165.00 T@1	13.75
144590 8/19/2020 WIP Discuss status of discovery deadline with <b>Herrington</b> .	C.R. Bridgers Misc Harris, Ardra	0.10 0.00	425.00 T@1	42.50
144612 8/20/2020 WIP Review documents produced by Defendant.	M. Benjamin Factual Development Harris, Ardra	0.42 0.00	425.00 T@1	177.08

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Slip ID	Dates and Time	Posting Status	Description	Timekeeper	Units DNB Time	Rate Rate Info Bill Status	Slip Value
				Activity Client Reference			
144613	TIME 8/20/2020 WIP		Review documents produced by Plaintiff.	M. Benjamin Factual Development Harris, Ardra	0.17 0.00	425.00 T@1	70.83
144614	TIME 8/20/2020 WIP		Review draft of Initial Disclosures	M. Benjamin Factual Development Harris, Ardra	0.20 0.00	425.00 T@1	85.00
144615	TIME 8/20/2020 WIP		Telephone conference with <b>Sorrenti</b> re: damage calculations and witness statements and records to be obtained.	M. Benjamin Factual Development Harris, Ardra	0.50 0.00	425.00 T@1	212.50
144617	TIME 8/20/2020 WIP		Email to <b>MDB/CRB/MH</b> re: additional docs needed from Defendants; Discussion with <b>MDB</b> ; file review; call to client; email to client;	J. Sorrenti DamageEst Harris, Ardra	0.80 0.00	165.00 T@1	132.00
144633	TIME 8/21/2020 WIP		Review email from client re incident reports and tracking time, respond to client with request for additional information.	C.R. Bridgers Factual Development Harris, Ardra	0.26 0.00	425.00 T@1	110.50
144651	TIME 8/21/2020 WIP		Emails to and from client re: documents to be requested	J. Sorrenti Factual Development Harris, Ardra	0.30 0.00	165.00 T@1	49.50
144725	TIME 8/25/2020 WIP		Send email re <b>JPR</b> / Discuss with <b>Sorrenti</b> .	C.R. Bridgers Ans_Discl_JPS Harris, Ardra	0.10 0.00	425.00 T@1	42.50
144727	TIME 8/25/2020 WIP		Follow up with <b>Sorrenti</b> and <b>Herrington</b> re witness calls; notes to file for follow up.	C.R. Bridgers Factual Development Harris, Ardra	0.16 0.00	425.00 T@1	68.00

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Slip ID	Dates and Time	Posting Status	Description	Timekeeper	Units	Rate	Slip Value
				Activity			
				Client		Rate Info	
				Reference	DNB Time	Bill Status	
144738	TIME 8/25/2020 WIP		Emails to and from CRB re: JPR; file review and review of emails from client re: relevant docs; emails to and from CRB/MDB/MH re: Disclosures and list of documents to be requested informally; discussion with CRB	J. Sorrenti Ans_Discl_JPS Harris, Ardra	0.50 0.00	165.00 T@1	82.50
144763	TIME 8/26/2020 WIP		Revised and finalized Joint Proposed Scheduling and Discovery Order and emailed to court and all parties	J. Sorrenti Ans_Discl_JPS Harris, Ardra	0.30 0.00	165.00 T@1	49.50
144783	TIME 8/27/2020 WIP		Review email from court re necessity of scheduling conference, review defendants response, and forward to Benjamin with request to respond.	C.R. Bridgers Misc Harris, Ardra	0.10 0.00	425.00 T@1	42.50
145169	TIME 9/15/2020 WIP		Review incoming protective order executed by Court; notes to file.	C.R. Bridgers Protect_Order Harris, Ardra	0.10 0.00	425.00 T@1	42.50
145215	TIME 9/16/2020 WIP		Review JLS correspondence with client; discuss evidence issues with JLS	M. Herrington ClientComm Harris, Ardra	0.10 0.00	350.00 T@1	35.00
145224	TIME 9/16/2020 WIP		Review emails to client re log book. Email to Benjamin re future assignments.	C.R. Bridgers Factual Development Harris, Ardra	0.10 0.00	425.00 T@1	42.50
145235	TIME 9/16/2020 WIP		Discussion with MH re: docs received from defense counsel; emails to and from MDB and MH; review of log books received; email to client re: additional info. needed	J. Sorrenti Factual Development Harris, Ardra	0.80 0.00	165.00 T@1	132.00

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Slip ID	Dates and Time	Posting Status	Description	Timekeeper	Units	Rate	Slip Value
	Activity	Client	Reference		DNB Time	Rate Info	
						Bill Status	
145327	TIME		J. Sorrenti Factual Development Harris, Ardra	0.10 0.00	165.00 T@1		16.50
9/18/2020							
WIP							
	Call to client-left message ; email to client						
145353	TIME		J. Sorrenti Ans_Discl_JPS Harris, Ardra	0.50 0.00	165.00 T@1		82.50
9/21/2020							
WIP							
	File review; review drafted Disclosures and damages; emails to <b>MDB/CRB/MH</b> re: status and Disclosures; call to client - left message						
145474	TIME		C.R. Bridgers Settlement Harris, Ardra	0.10 0.00	425.00 T@1		42.50
9/23/2020							
WIP							
	Review incoming email from <b>opp</b> counsel re settlement offer; follow up with Benjamin and <b>ntoes</b> to file.						
145483	TIME		C.R. Bridgers Settlement Harris, Ardra	0.23 0.00	425.00 T@1		97.75
9/23/2020							
WIP							
	Respond as to settlement <b>possibility</b> and damage calculation.						
145523	TIME		J. Sorrenti Factual Development Harris, Ardra	0.40 0.00	165.00 T@1		66.00
9/23/2020							
WIP							
	Emails to and from client; file review; ;emails to and from <b>MDB/MH/CRB</b>						
145509	TIME		M. Herrington DamageEst Harris, Ardra	0.10 0.00	350.00 T@1		35.00
9/24/2020							
WIP							
	Discuss damages estimate issues with JLS						
145514	TIME		J. Sorrenti DamageEst Harris, Ardra	0.50 0.00	165.00 T@1		82.50
9/24/2020							
WIP							
	Discussion with <b>MH</b> ; discussion with <b>CRB</b> re: range of damages; emails to and from <b>MDB/MH/CRB</b> ; call to client-left message						
145531	TIME		C.R. Bridgers DamageEst Harris, Ardra	0.29 0.00	425.00 T@1		123.25
9/24/2020							
WIP							
	<b>MEeting</b> with <b>Herrington</b> and <b>Sorrenti</b> re offer and need for more records.						

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Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time	Rate Rate Info Bill Status	Slip Value
145565 9/25/2020 WIP Revising initial disclosures; reviewing Def initial disclosures	M. Herrington Ans_Discl_JPS Harris, Ardra	0.80 0.00	350.00 T@1	280.00
145604 9/25/2020 WIP Emails to and from <b>MDB/CRB/MH</b> re: Disclosures; discussed <b>info.</b> contained in Disclosures with <b>MH</b>	J. Sorrenti Ans_Discl_JPS Harris, Ardra	0.30 0.00	165.00 T@1	49.50
145592 9/29/2020 WIP Review of <b>info.</b> from client; email to <b>CRB/MDB/MH</b> ; emails to and from <b>client</b>	J. Sorrenti DamageEst Harris, Ardra	0.20 0.00	165.00 T@1	33.00
145625 9/30/2020 WIP Call with <b>OC</b> ; discuss counteroffer with <b>CRB</b> ; call <b>MDB</b> re: same; call client re: same; draft counteroffer to <b>OC</b>	M. Herrington Settlement Harris, Ardra	0.70 0.00	350.00 T@1	245.00
145639 9/30/2020 WIP Work with <b>Herrington</b> on offer / counter offer / and second round.	C.R. Bridgers Settlement Harris, Ardra	0.34 0.00	425.00 T@1	144.50
145763 10/5/2020 WIP Review <b>Herrington</b> email re settlement counterproposal. Email to <b>Ardra</b> Harris re same and her <b>quetions</b> .	C.R. Bridgers Settlement Harris, Ardra	0.23 0.00	425.00 T@1	97.75
145817 10/8/2020 WIP Respond to <b>Herrington/Benjamin</b> on last offer.	C.R. Bridgers DamageEst Harris, Ardra	0.22 0.00	425.00 T@1	93.50
145829 10/8/2020 WIP Review correspondence from <b>OC</b> ; arrange tax form production with <b>CRB</b> and client; send allocation to	M. Herrington Settlement Harris, Ardra	0.10 0.00	350.00 T@1	35.00

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Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time	Rate Rate Info Bill Status	Slip Value	
OC					
145846 10/8/2020 WIP Discuss final <b>settlementn</b> with <b>Herrington</b> .	C.R. Bridgers Settlement Harris, Ardra	0.34 0.00	425.00 T@1	144.50	
145853 10/9/2020 WIP Review settlement documents; call with client; correspondence with OC	M. Herrington Settlement Harris, Ardra	0.60 0.00	350.00 T@1	210.00	
146167 10/30/2020 WIP review motion for <b>settlementn</b> and notes to file.	C.R. Bridgers Settlement Harris, Ardra	0.10 0.00	425.00 T@1	42.50	
147081 12/17/2020 WIP Review settlement agreement to assist in determination of proceeds loan; Communicate with <b>Herrington</b> re same.	C.R. Bridgers Misc Harris, Ardra	0.25 0.25	425.00 T@1 No Charge	105.42	
147101 12/17/2020 WIP Emails to and from <b>MH</b>	J. Sorrenti Settlement Harris, Ardra	0.10 0.00	165.00 T@1	16.50	
147120 12/18/2020 WIP Review communication from lender; discuss firm policies with client; discuss lending issue with <b>CRB</b> ; review settlement motion and settlement terms; send settlement to lender; advise client on firm position on lending	M. Herrington Settlement Harris, Ardra	0.50 0.50	350.00 T@1 No Charge	175.00	
147123 12/21/2020 WIP Prepare Disbursement and Distribution.	C.R. Bridgers Settlement Harris, Ardra	0.75 0.00	425.00 T@1	318.75	

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Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time	Rate Rate Info Bill Status	Slip Value
147425 1/19/2021 WIP Drafting supplemental brief for fees motion	M. Herrington Motions Harris, Ardra	0.70 0.00	350.00 T@1	245.00
147426 1/19/2021 WIP Begin drafting declaration for supplemental brief to fees motion; discuss with CRB need for him to complete declaration rather than me	M. Herrington Motions Harris, Ardra	0.40 0.00	350.00 T@1	140.00
147446 1/19/2021 WIP Review issues on Bridgers declaration and strategy on filing same.	C.R. Bridgers Motions Harris, Ardra	0.23 0.00	425.00 T@1	97.75
147444 1/20/2021 WIP Finalize revisions to supplemental brief; forward to CRB for review	M. Herrington Motions Harris, Ardra	0.20 0.00	350.00 T@1	70.00
147497 1/22/2021 WIP Draft and edit Bridgers Declaration on Fees.	C.R. Bridgers Motions Harris, Ardra	1.25 0.00	425.00 T@1	531.25
Grand Total				
	Billable	49.59		13272.85
	Unbillable	0.75		280.42
	Total	50.34		13553.27

# **ATTACHMENT B**

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Slip Listing

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Selection Criteria

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Clie.Selection	Include: Harris, Ardra
Slip.Transaction Type	Expense
Slip.Classification	Open

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Rate Info - identifies rate source and level

Slip ID		Timekeeper	Units	Rate	Slip Value
Dates and Time		Activity	DNB Time	Rate Info	
Posting Status		Client		Bill Status	
Description		Reference			
143224	EXP	W & H Project	1	400.00	400.00
5/21/2020		\$Filing Fee			
WIP		Harris, Ardra			
Filing Fee					
144680	EXP	W & H Project	1	85.00	85.00
8/24/2020		\$Service Fee			
WIP		Harris, Ardra			
Service Fee for Process					
<hr/>					
Grand Total		Billable	0.00	485.00	
		Unbillable	0.00	0.00	
		Total	0.00	485.00	
<hr/>					

# **ATTACHMENT C**

1/22/2021  
1:02 PMDeLong Caldwell Bridgers Fitzpatrick & Benjamin, LLC  
--DCBFB Fee Split and Fee App Time Summary Listing-By Timekeeper

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## Selection Criteria

Slip.Slip Type Clie.Selection	Time Include: Harris, Ardra
----------------------------------	--------------------------------

Rate Info - identifies rate source and level

Slip ID Dates and Time Posting Status Description	Timekeeper Activity Client Reference	Units DNB Time	Rate Rate Info Bill Status	Slip Value	Billed SV Adjustment Markup
C.R. Bridgers					
	Billable	8.40		3570.71	3570.71
	Unbillable	0.25		105.42	
	Total	8.65		3676.13	
J. Sorrenti					
	Billable	26.28		4336.75	4336.75
	Unbillable	0.00		0.00	
	Total	26.28		4336.75	
M. Benjamin					
	Billable	8.71		3690.39	3690.39
	Unbillable	0.00		0.00	
	Total	8.71		3690.39	
M. Herrington					
	Billable	4.00		1400.00	1400.00
	Unbillable	0.50		175.00	
	Total	4.50		1575.00	
S. Toenes					
	Billable	2.20		275.00	275.00
	Unbillable	0.00		0.00	
	Total	2.20		275.00	
Grand Total					
	Billable	49.59		13272.85	13272.85
	Unbillable	0.75		280.42	
	Total	50.34		13553.27	

# **ATTACHMENT D**

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--DCBFB Slip Summary by Activity-Summary Only-No Detail

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## Selection Criteria

Slip.Billing Status	Billable			
Slip.Slip Type	Time			
Clie.Selection	Include: Harris, Ardra			
<hr/>				
Title	Amount	% Total	Time	% Total
01-Intake				
Fees: Slip Value	1285.58	9.69%	3.24	6.53%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	1285.58	9.69%	3.24	6.53%
02-Complaint_COIP_Service				
Fees: Slip Value	3782.79	28.50%	17.74	35.77%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	3782.79	28.50%	17.74	35.77%
03-Answer_Disclosures_JPR				
Fees: Slip Value	3166.99	23.86%	12.94	26.09%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	3166.99	23.86%	12.94	26.09%
06-Damage Estimate				
Fees: Slip Value	604.25	4.55%	2.41	4.86%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	604.25	4.55%	2.41	4.86%
09-Protect_Order				
Fees: Slip Value	42.50	0.32%	0.10	0.20%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	42.50	0.32%	0.10	0.20%
13-Motions				
Fees: Slip Value	1084.00	8.17%	2.78	5.61%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	1084.00	8.17%	2.78	5.61%
16-Settlement				
Fees: Slip Value	1437.25	10.83%	3.69	7.44%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	1437.25	10.83%	3.69	7.44%
26-Client Communication				
Fees: Slip Value	35.00	0.26%	0.10	0.20%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	35.00	0.26%	0.10	0.20%
27-Legal Research Other				
Fees: Slip Value	131.75	0.99%	0.31	0.63%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	131.75	0.99%	0.31	0.63%
29-Misc. Case Efforts				
Fees: Slip Value	134.50	1.01%	0.50	1.01%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	134.50	1.01%	0.50	1.01%
30-Fact Develop (not otherwise				
Fees: Slip Value	1568.24	11.82%	5.78	11.66%
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	1568.24	11.82%	5.78	11.66%
Grand Total				
Fees: Slip Value	13272.85	100.00%	49.59	100.00%

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--DCBFB Slip Summary by Activity-Summary Only-No Detail

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Title	Amount	% Total	Time	% Total
Costs: Slip Value	0.00	0.00%		
Total: Slip Value	13272.85	100.00%	49.59	100.00%